UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. S1-4:16 CR 163 RWS
	)	
OSCAR HENRY STEINMETZ,	)	
	)	
	)	
Defendant.	)	

GOVERNMENT'S SUMMARY OF EXPECTED EXPERT TESTIMONY

COMES NOW the United States of America, by and through its attorneys, Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and Robert F. Livergood, Assistant United States Attorney for said District, and submits the following summary of expected expert testimony to be offered at trial in this case.

The Government expects Detective Steven H. Grimm to testify concerning his examination of defendant's computer equipment. Det. Grimm is a police officer with the Webster Groves Police Department and is currently assigned to the Regional Computer Crimes Education and Enforcement Group (RCCEEG).

Evidence Reviewed by Det. Grimm

It is anticipated that Det. Grimm will testify regarding his forensic examination of the following items, which are listed on pages Steinmetz_00107 to Steinmetz_00125:

Item 1: eMachines brand desktop computer, S/N: XRD7130036535
Item 2: eMachines brand desktop computer, S/N: GAT4710013821
Item 3: Gateway brand desktop computer, S/N: 0008202425
Item 4: Dell brand desktop computer, S/N: 392M00B
Item 5: Toshiba brand laptop computer, S/N: 7A697017Q
Item 6: Western Digital brand hard drive, S/N: WCANKD513677

Item 7:	Acer brand laptop computer, S/N: LUSBN0D0010120A3671601
Item 8:	Western Digital brand external hard drive, S/N: WCASU3635841
Item 9:	Western Digital brand external hard drive, S/N: WCASU0382867
Item 10:	Western Digital brand external hard drive, S/N: WCASU4405261
Item 11:	Western Digital brand external hard drive, S/N: CASU0551350
Item 12:	Simpletech brand external hard drive, S/N: 08135080500314183
Item 13:	Western Digital brand external hard drive, unknown S/N
Item 14:	Western Digital brand external hard drive, unknown S/N
Item 15:	Toshiba brand external hard drive, unknown S/N
Item 16:	Toshiba brand external hard drive, unknown S/N
Item 17:	Toshiba brand external hard drive, unknown S/N
Item 18:	Targus brand adapter, with SanDisk brand SD memory card
Item 19:	Two (2) SanDisk brand adapters, with SanDisk b and MicroSD memory card
Item 20:	PNY brand thumb drive, no S/N
Item 21:	Kodak brand digital camera, S/N: KCXGZ73311947, containing SanDisk brand SD memory card.

2. Summary of Det. Grimm's Testimony

The following is a summary of Det. Grimm's testimony. It is anticipated that Det. Grimm will testify that he reviewed and forensically analyzed the items listed above. Det. Grimm will base his testimony on and is qualified to testify as such, due to his training and experience received during his tenure as a law enforcement officer.[1] Det. Grimm has been a computer forensic examiner for more than nine years. He has been a law enforcement officer with the Webster Groves Police Department for more than twelve years. Det. Grimm has conducted forensic examinations of hundreds of computers, CDs/DVDs, diskettes, memory devices and other media. Det. Grimm's findings are contained in his written forensic report (RCCEEG of Greater St. Louis Offense/Incident Report 2015-000099, which has been provided to the defense.

[1] See Det. Grimm's "Statement of Qualifications," attached hereto as Attachment 1.

The electronic report, with child pornography images and videos, is available to defendant's counsel to be viewed at the U.S. Attorney's office.

Det. Grimm's testimony will cover the contents of his forensic report and the electronic report. Det. Grimm will testify that images of minor children engaged in sexually explicit conduct were found on some of the above items. He will testify about the location of the files containing the images and videos, the dates associated with them, and his forensic analysis. He will testify about file paths, and other documents found on the devices that demonstrate ownership and/or access to the images of child pornography, such as letters written by defendant and his resume. *See*, e.g., Screen Shots (Steinmetz_00329 - Steinmetz_00346).

Det. Grimm will testify that he used forensic tools such as Forensic Tool Kit (FTK), Internet Evidence Finder (IEF), and others. He will testify about the methods and procedures he used to conduct the forensic review of the seized items. He will also testify as to his background in conducting forensic analyses and in particular, forensic analyses concerning child pornography.

Forensic Analysis of Western Digital Brand External Hard Drive (Item 8)

It is anticipated that Det. Grimm will testify that one of the items he forensically analyzed was defendant's Western Digital brand external hard drive (Item 8). Det. Grimm will testify that he found data associated with the America Online application, including email information dating back to the year 2001 and earlier. He also located user names "Dragon57" and "JStuffons0." From his analysis, he believes that Dragon57 was the profile used by the defendant, and JStuffons0 was the profile used by "F's" mother. The emails allude to their sexual lifestyles. One email, dated January 27, 2001, discuss "F's" mother finding the defendant, naked, in "F's" bedroom the night before.

Additionally, there are exchanges between "JStuffins0" and "Vash 330." "Vash 330" was the profile used by "F." These emails were from the year 2005 and provide information about the incidents between the defendant and "F."

Det. Grimm will testify about the 26 images of "F" that he found on the hard drive. The images depict "F" nude, in erotic and pornographic poses. Det. Grimm will testify about when he believes the pictures were taken and when they were copied to a storage device. He will also testify about the file path where the images were found, and about the overall file structure and the storage of other photos.

He will testify about that one of the images of the victim was cropped. In that image, the victim was wearing a leather harness and chains. Det. Grimm will testify that he found an image of "F's" mother wearing the same type of leather harness with chains.

Det. Grimm will testify about and show screen shots that depict the file contents and structure.

Forensic Analysis of Western Digital Brand External Hard Drive (Item 9)

It is anticipated that Det. Grimm will testify that he examined defendant's Western Digital brand external hard drive (Item 9). He will testify that he found 24 images of the victim nude, in erotic and pornography poses. He will testify that these images appear to be duplicates of those found on Item 8. He will testify that these images of the victim found on Item 9 were located in the unallocated drive space, meaning that they had been deleted.

Det. Grimm will testify that he found 23 non-pornographic, candid images of an unidentified female juvenile. He will testify that the he believes the images were taken in 2008 or

2009.

Det. Grimm will also testify that he found five images that depicted child erotica.

The Government will argue that some of these five images depict naked prepubescent minor children in lascivious exhibition of their genitals.

Forensic Analysis of Toshiba Brand External Hard Drive (Item 16)

It is anticipated that Det. Grimm will testify that he examined defendant's Toshiba brand external hard drive (Item 16). He will testify that he found a folder named "Jailbait" that contained 21 non-pornographic celebrity images. He will also testify that he found 591 comic-style images containing incest them drawings (anime).

Respectfully submitted,

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s/ Robert F. Livergood

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Ms. Lucy Liggett
Assistant Federal Public Defender.

s/ Robert F. Livergood
ROBERT F. LIVERGOOD, 35432MO
Assistant United States Attorney